

Exhibit W



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Transcript of Cristina Hoyos

Date: November 18, 2020

Case: Cellular Communications Equipment LLC -v- HMD Global Oy

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

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CELLULAR COMMUNICATIONS :
EQUIPMENT, LLC, :
Plaintiff, : Civil Action
v. : No. 2:20-CV-00078-JRG
HMD GLOBAL OY, :
Defendant. :

- - - - - x

Virtual Videotaped Deposition of
CRISTINA HOYOS
Wednesday, November 18, 2020
7:59 a.m. CST

Job No.: 334658
Pages: 1 - 36
Reported by: THERESA A. VORKAPIC,
CSR, RMR, CRR, RPR

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Conducted on November 18, 2020

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Virtual Videotaped deposition of Cristina
Hoyos taken pursuant to subpoena before Theresa A.
Vorkapic, a Certified Shorthand Reporter,
Registered Merit Reporter, Certified Realtime
Reporter, Registered Professional Reporter and a
Notary Public in and for the State of Illinois.

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1 A Head of finance for the Americas region.

2 BY MR. PALMER:

3 Q How long have you held this job title?

4 A Since I joined the company, January '18.

5 Q So in your role, are you responsible for
6 marketing at all?

7 A No. I support marketing, but I'm not
8 responsible. I support the person that heads the
9 marketing, that coordinates marketing, but I'm not
10 in charge of marketing.

11 Q Can you go into more detail about how you
12 support the person in marketing?

13 A From the budget perspective. So I ask her
14 questions about how much money she's going to
15 spend basically. And if she is spending more than
16 what it's approved, but that's the extent, so I
17 take care of the budgets for the region.

18 Q And in your position, are you responsible
19 for sales?

20 A No.

21 Q Do you support any of the sales staff like
22 you do the marketing staff?

23 A Absolutely. I support. That's my main
24 role. I support the VP of sales for the Americas
25 region.

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1 Q So now I want to go into the declaration
2 you gave for the motion to transfer.

3 Do you remember giving that declaration?

4 THE WITNESS: Yes.

5 MR. PALMER: Enrique, can you go ahead and
6 pull up Exhibit 1. I'm going to put this up on
7 the screen for you.

8 (A certain document was marked Hoyos
9 Deposition Exhibit 1 for identification,
10 as of 11/18/2020.)

11 BY MR. PALMER:

12 Q I want to go ahead and look at No. 2 on
13 the declaration. Maybe Enrique will scroll down
14 for me.

15 Can you go ahead and read No. 2 for me?

16 A Yes. "As head of finance, my duties
17 include overseeing the sale of Nokia mobile
18 devices to United States wireless communications
19 carriers and distributors including Verizon and
20 Quality One Wireless."

21 Q I want to go into description of your
22 duties.

23 Can you go into a little more detail about
24 what overseeing the sale of Nokia branded mobile
25 devices means?

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1 A Sure. Absolutely similar to what I said
2 before, one of the aspects of my job is to make
3 sure the forecasts that I receive from the
4 different GMs that manage these accounts make
5 sense, would review and will load these forecasts
6 every month formally into the system.

7 I also -- when I say I oversee, I also
8 discuss with them if they have any promotion. I
9 don't necessarily know exactly what is it that
10 they're -- what is it that they're discussing with
11 the carrier or with Quality One Wireless, but I do
12 approve if we have the funds to approve these
13 rebates or these sales with one of these devices
14 and I make sure they don't spend more it than what
15 has been approved.

16 Q Do you work with a team for these duties,
17 with a team?

18 A With the HMD America teams, yes,
19 absolutely.

20 Q Are you in charge of that team?

21 A No, I'm not.

22 Q Who is above you?

23 A Who is in charge of that team you mean?

24 Q Yes.

25 A The GM, the sales or each of them they

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1 of doing it or if I know how, but some other
2 documents are located in the office of Miami. We
3 get some tax information in the office of Miami.
4 Some HR documents gets to the office in Miami, so
5 that's what I'm referring to this.

6 Q When you say the ones that are in the
7 offices in Miami, do you mean those ones where
8 there are physical copies located in those
9 offices?

10 A Correct.

11 Q You said some are accessed electronically.
12 Are they also available via your computer?

13 A Some documents can be retrieved from the
14 computer, correct.

15 Q Can you explain which documents are
16 located where?

17 MS. KASH: Objection to form.

18 BY MR. PALMER:

19 Q Which are physical versus which are
20 electronic?

21 A I was just giving you an example of
22 sometimes some of the tax authorities across North
23 America they don't -- they're changing now, but
24 they send mail so that's what I'm referring to,
25 but I couldn't list exactly what type of documents

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1 Q What do you consider yourself an employee
2 of HMD America or HMD Global?

3 A HMD America, I'm located here in Miami. I
4 go to the office in Miami, obviously under the
5 pandemic I've been working from home. That's our
6 office. That's where we meet. That's where we
7 have our meetings face to face.

8 Q Do any of your direct supervisors refer to
9 your business as HMD Global?

10 MS. KASH: Objection to form.

11 BY THE WITNESS:

12 A Any of my supervisors? HMD Global, HMD
13 America, we just are HMD employees. It is our
14 brand.

15 BY MR. PALMER:

16 Q So next I want to look at Enrique can you
17 pull up Exhibit 5.

18 (A certain document was marked Hoyos
19 Deposition Exhibit 5 for identification,
20 as of 11/18/2020.)

21 BY MR. PALMER:

22 Q Ms. Hoyos, do you recognize this web page?

23 A Yes, I wish I looked like that. Yes, this
24 is my Linked In profile.

25 Q This is an accurate representation of

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CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

I, Theresa A. Vorkapic, Certified
Shorthand Reporter No. 084-2589, CSR, RMR, CRR,
RPR, and a Notary Public in and for the County of
Kane, State of Illinois, the officer before whom
the foregoing deposition was taken, do hereby
certify that the foregoing transcript is a true
and correct record of the testimony given; that
said testimony was taken by me and thereafter
reduced to typewriting under my direction; that
reading and signing was not requested; and that I
am neither counsel for, related to, nor employed
by any of the parties to this case and have no
interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my notarial seal this 23rd day of
November, 2020.

My commission expires November 6, 2023.



THERESA A. VORKAPIC

NOTARY PUBLIC IN AND FOR ILLINOIS